

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

United States of America, : Case No. 3:18-CR-00168-2  
Plaintiff, : HON. JEFFREY J. HELMICK  
vs. : **MOTION FOR LEAVE TO FILE**  
Barbara Wilson, et al., : **CJA MATTERS UNDER SEAL AND**  
Defendants. : **EX PARTE**

Defendant Barbara Wilson respectfully moves the Court for an Order permitting counsel leave to file all CJA-related matters under seal and *ex parte*. A defendant's CJA-related filings (including filings related to experts, attorney fees, budgeting materials, and other matters) contain confidential attorney work product which the Government is not entitled to discover.

Respectfully submitted,

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**PROOF OF SERVICE**

This is to certify that a copy of the foregoing has been filed electronically this 17th day of April, 2018. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system, and the parties may access this filing through the Court's system.

/s/ Adam S. Nightingale

Attorney for Defendant Barbara Wilson